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 Attorney for Defendant,
 Paysign, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RYAN WILLIAMS,)	Case No:
)	
Plaintiff,)	NOTICE OF REMOVAL OF
)	ACTION
vs.)	
)	
PAYSIGN, INC.,)	
)	
Defendant.)	
_____)	

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:

PLEASE TAKE NOTICE that Defendant, Paysign, Inc., hereby files this Notice of Removal of Action of this case from the Eighth Judicial District Court of the State of Nevada, Case No. A-21-832106-C (the "State Action"), in which it is now pending, to the United States District Court for the District of Nevada, and respectively state as follows:

1. The jurisdiction of this court is invoked under 28 U.S.C. § 1331.
2. On March 31, 2021, Plaintiff filed her Complaint in the State Action, which Complaint was served on Defendant on April 22, 2021. All available process, pleadings and orders served on Defendant in connection with the State Action are attached hereto as Exhibit A.

3. The grounds for removal are as follows: While perhaps inartfully, the Complaint appears to allege claims under the Americans with Disabilities Act, 42 U.S.C. §12101 *et. seq.*, giving this Court subject matter jurisdiction under 28 U.S.C. § 1331.¹

4. This Notice of Removal of Action is executed pursuant to Rule 11 of the Federal Rules of Civil Procedure.

DATED this 13th day of May 2021.

FISHER & PHILLIPS, LLP

By: /s/ Scott M. Mahoney, Esq.
300 South Fourth Street
Suite 1500
Las Vegas, Nevada 89101
Attorneys for Defendant

¹ The 30 days to remove an action is triggered when the four corners of the pleading reveal a basis for removal. *Harris v. Bankers Life and Casualty Company*, 425 F.3d 689, 694 (9th Cir. 2005). Paragraph 6 of the Complaint alleges that Plaintiff “notif[ied] Human Resources . . . that she had a protected disability” and that Defendant committed “a direction violation of the [ADA].” Plaintiff also attaches to the Complaint her Charge of Discrimination filed with the EEOC alleging disability discrimination and retaliation in violation of the ADA and the Dismissal and Notice of Rights issued by the EEOC.

CERTIFICATE OF MAILING

This is to certify that on the 13th day of May 2021, the undersigned, an employee of Fisher & Phillips LLP, deposited the foregoing Notice of Removal of Action in the United States mail, with postage prepaid, addressed to:

Ms. Ryan Williams
930 Carnegie Street
Apt. 311
Henderson, NV 89052

By: /s/ Sarah Griffin
An employee of Fisher & Phillips LLP

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